**From:** <jochen.koenig@drschenk.com>

**Tor** <gkhalek@fcc.gov>

**Date:** Thu. Aug 22,2002 6:42 PM

**Subject:** Comment on Further Notice of Proposed Rule Making, Docket Number00-48

00-48

Dear Mr. Khalek,

in lieu of the German manufacturer of Inmarsat-E EPIRB's, Fastnet-Radio AG, I would like to comment that we fully support the proposed ruling, in particular the Part 9. (Paragraph 121) of FCC 01-102 and would welcome a swift adoption of said ruling.

Because Inmarsat-E EPIRBs are in use throughout the world, except the USA, and because appropriate test standards (ETS 300 372, Inmarsat SDM 2.0) have been already developed and comply with IMO-resolutions A.812(19) and A.694(17), we would strongly recommend to adopt those test standards as they are, or approve EPIRBs that were tested according to that standard without further testing requirements. This would minimize the time, within which vessels under American flag could benefit of the very fast response time that the Inmarsat-E EPIRBs offer. Currently the USA is, to my knowledge, literally the only country in the world, that does not permit vessels under its flag to utilize Inmarsat-E EPIRB's.

I have not yet examined the applicable RTCM standard for 406MHz EPIRB's in detail, would however assume, that those are very similar to the above mentioned ETS 300 372.

In summary, the following benefits of the Inmarsat-E EPIRB system would greatly improve the safety of vessels under American flag:

- Virtually instantaneous distress signal transmission to appropriate SAR-stations globally (polar caps excluded) instead of sometimes delays up to 1h in areas where no GEOSAT coverage is available for 406 MHz Beacons (such as many parts of Europe).
- Precise position information because GPS is utilized to transmit up-to date position information. 406MHz Beacons may, but do not have to provide this feature and Doppler-Method does not provide very accurate position information (errors up to 22NM and long message delays for 406MHz Beacons have been reported in tests such as one conducted by the Swedish Maritime Safety Inspectorate in Nov. 2001)
- Optionally the some of the beacons feature an integrated 9GHz Radar Transponder to provide better nighttime homing capabilities by any vessels, even leisure vessels equipped with radar.

We appreciate the opportunity to comment on this proposed ruling and are looking forward its adoption.

***Best*** Regards.

Jochen Koenig, Dr.-Ing

Managing Director

Dr. Schenk of America LLC
1890 Wooddale Drive

Suite 600
Woodbury. MN 55125
**USA**

Tel.: +1 - 651 - 730 - 4090 Extension: 2008
Fax.: +1 - 651 - 730 - 1955
Email: Jochen.KoenigQdrschenk.com
Homepage: http://www.drschenk.com